

EXHIBIT A

From: [Helen Chaitman](#)
To: [Jacobs, Edward J.](#)
Cc: [Amy Sanchez](#); [Greg Dexter](#); [Sarah Howell](#); [Sheehan, David J.](#); [Cremona, Nicholas](#)
Subject: RE: Madoff.Clawback Notice of Subpoena of Hendrik Voigt
Date: Wednesday, March 29, 2017 12:16:58 PM

No. We are serving the subpoenas.

Helen Davis Chaitman
Chaitman LLP
465 Park Avenue
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hchaitman@chaitmanllp.com
Cell: (908) 303-4568
Fax: (888) 759-1114

From: Jacobs, Edward J. [mailto:ejacobs@bakerlaw.com]
Sent: Wednesday, March 29, 2017 12:01 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Amy Sanchez <asanchez@chaitmanllp.com>; Greg Dexter <gdexter@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>; Sheehan, David J. <dsheehan@bakerlaw.com>; Cremona, Nicholas <ncremona@bakerlaw.com>
Subject: RE: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

Helen,

That does not answer my question. Will you hold the subpoenas in abeyance until after the conference on the 11th?

Thanks,
Ted

From: Helen Chaitman [mailto:hchaitman@chaitmanllp.com]
Sent: Wednesday, March 29, 2017 11:57 AM
To: Jacobs, Edward J.
Cc: Amy Sanchez; Greg Dexter; Sarah Howell; Sheehan, David J.; Cremona, Nicholas
Subject: RE: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

I doubt very much that any of the traders has any documents responsive to the subpoenas but, if anyone produces any such documents, I will provide you with copies. I would assume you would want to see them, in any event.

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From: Jacobs, Edward J. [<mailto:ejacobs@bakerlaw.com>]
Sent: Wednesday, March 29, 2017 11:55 AM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Amy Sanchez <asanchez@chaitmanllp.com>; Greg Dexter <gdexter@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>; Sheehan, David J. <dsheehan@bakerlaw.com>; Cremona, Nicholas <ncremona@bakerlaw.com>
Subject: RE: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

Helen,

We can discuss all of this with the Judge. In the meantime, can you please let me know your position on holding the subpoenas in abeyance?

Ted

From: Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]
Sent: Wednesday, March 29, 2017 11:48 AM
To: Jacobs, Edward J.
Cc: Amy Sanchez; Greg Dexter; Sarah Howell; Sheehan, David J.; Cremona, Nicholas
Subject: RE: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

Ted: This discovery has nothing to do with Madoff's testimony. I don't know why you would think it does. We demanded production of all of our cases of all of Madoff's trading records. You deliberately withheld trading records. Last May, Judge Bernstein told you that, if you haven't produced all the trading records, you have to do so immediately. You ignored Judge Bernstein's order. We are entitled to all of Madoff's trading records. It has nothing whatsoever to do with Madoff's deposition.

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From: Jacobs, Edward J. [<mailto:ejacobs@bakerlaw.com>]
Sent: Wednesday, March 29, 2017 11:14 AM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Amy Sanchez <asanchez@chaitmanllp.com>; Greg Dexter <gdexter@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>; Sheehan, David J. <dsheehan@bakerlaw.com>; Cremona, Nicholas <ncremona@bakerlaw.com>
Subject: RE: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

Helen,

This is nothing like the situation where you were opposing the Rule 45 subpoenas. The authority is the Court order compelling you to obtain leave of Court to serve new discovery relating to Madoff's testimony, which you ignored. In addition, the Court specifically told me when we spoke that it has no availability for a hearing prior to the 11th, so really your agreement to hold the subpoenas in abeyance would be a professional courtesy to the Court. I told the Court I would ask for your agreement to hold the subpoenas in abeyance since there is no prejudice to you or to the extension of the return dates on the few subpoenas that have even been served at this juncture to accommodate its scheduling needs. The Court specifically instructed me to tell you that if you were unwilling to do so, then you should call the Court to let it know.

I also note for the record that you routinely miss deadlines in responding to discovery and with respect to other matters, yet we regularly extend professional courtesies by extending those dates, even after the fact. In fact, this happened just this past week in one of your cases. I really hope we are not reverting back to games of tit-for-tat, as that would be most unfortunate.

Please let me know your position so I can inform the Court. If you are refusing to hold the subpoenas in abeyance, then you will have to call the Court and explain as well.

Regards,
Ted

From: Helen Chaitman [<mailto:hchaitman@chaitmanllp.com>]
Sent: Wednesday, March 29, 2017 9:41 AM
To: Jacobs, Edward J.
Cc: Amy Sanchez; Greg Dexter; Sarah Howell; Sheehan, David J.; Cremona, Nicholas
Subject: RE: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

I will not schedule any depositions until after 4/11 but what is your authority for the stay of production of documents responsive to the subpoena? You took precisely the contrary position when we opposed your subpoenas.

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From: Jacobs, Edward J. [<mailto:ejacobs@bakerlaw.com>]
Sent: Wednesday, March 29, 2017 7:15 AM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Amy Sanchez <asanchez@chaitmanllp.com>; Greg Dexter <gdexter@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>; Sheehan, David J. <dsheehan@bakerlaw.com>; Cremona, Nicholas <ncremona@bakerlaw.com>
Subject: Re: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

Thanks Helen. In addition to that, you will also need to confirm that you will inform any subpoenaed person that there is a pending motion to quash and that all compliance - including any document productions - is being held in abeyance pending the Court's specific instructions.

Can you please confirm?

Thank you,
Ted

On Mar 29, 2017, at 5:28 AM, Helen Chaitman <hchaitman@chaitmanllp.com> wrote:

April 11th works. I will not schedule any depositions until after the 11th.

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From: Jacobs, Edward J. [<mailto:ejacobs@bakerlaw.com>]
Sent: Tuesday, March 28, 2017 5:25 PM
To: Amy Sanchez <asanchez@chaitmanllp.com>; Helen Chaitman <hchaitman@chaitmanllp.com>
Cc: Greg Dexter <gdexter@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>; Sheehan, David J. <dsheehan@bakerlaw.com>; Cremona, Nicholas <ncremona@bakerlaw.com>
Subject: RE: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

Helen,

The Court would like to schedule a hearing on our letter seeking to quash all of the subpoenas for April 11th at 10 am since we will all be in Court at that time on your letter regarding expert dates and for the Saren-Lawrence and Nelsons conferences.

Please confirm so I can get back to the Court. Also please confirm you will instruct all subpoenaed parties not to comply until after that date.

Regards,
Ted

From: Jacobs, Edward J.
Sent: Monday, March 27, 2017 5:17 PM
To: 'Amy Sanchez'; Sheehan, David J.; Cremona, Nicholas
Cc: Greg Dexter; Helen Chaitman; Sarah Howell
Subject: RE: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

Amy,

Thanks for passing these along. Have you let the recipients who have been served know that there is a pending motion to quash?

Please advise.

Regards,
Ted

From: Amy Sanchez [<mailto:asanchez@chaitmanllp.com>]
Sent: Monday, March 27, 2017 2:46 PM
To: Sheehan, David J.; Cremona, Nicholas; Jacobs, Edward J.
Cc: Greg Dexter; Helen Chaitman; Sarah Howell
Subject: RE: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

Dear Counsel,

Please find attached proof of service of the Notice of Subpoena Hendrik Voigt.

Thank you,

Amy Watson Sanchez
Paralegal
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From: Amy Sanchez
Sent: Wednesday, March 15, 2017 9:00 PM
To: 'dsheehan@bakerlaw.com' <dsheehan@bakerlaw.com>; 'ncremona@bakerlaw.com' <ncremona@bakerlaw.com>; 'ejacobs@bakerlaw.com' <ejacobs@bakerlaw.com>
Cc: Greg Dexter <gdexter@chaitmanllp.com>; Helen Chaitman <hchaitman@chaitmanllp.com>; Sarah Howell <showell@chaitmanllp.com>
Subject: Madoff.Clawback Notice of Subpoena of Hendrik Voigt

Dear Counsel,

Attached, please find for service our Notice of Subpoena of Hendrik Voigt.

Thank you,

Amy Watson Sanchez
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